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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 IN RE OPTICAL DISK DRIVE PRODUCTS  
14 ANTITRUST LITIGATION

CASE NO. 3:10-md-2143 RS

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**STIPULATION AND [PROPOSED]  
ORDER REGARDING PLAINTIFFS'  
ADMINISTRATIVE MOTIONS TO SEAL  
(DOCKET NOS. 877, 880, 881 AND 895)**

17 This document relates to:

DATE ACTION FILED: Oct. 27, 2009

18 ALL ACTIONS

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1           WHEREAS, on May 29, 2013, plaintiffs' counsel filed three administrative motions to file  
 2 materials under seal, as Docket Nos. 877, 880, and 881;

3           WHEREAS, on June 3, 2013, the indirect purchaser plaintiffs filed an additional  
 4 administrative motion to file materials under seal, as Docket No. 895;

5           WHEREAS, under Civil Local Rule 79-5(d), the deadline for filing declarations and  
 6 materials in response to these administrative motions to seal is currently June 5, 2013 (as to  
 7 Docket Nos. 877, 880 and 881) and June 10, 2013 (as to Docket No. 895);

8           WHEREAS, the administrative motion to seal filed by the direct purchaser plaintiffs  
 9 (Docket No. 877) covers more than 200 exhibits submitted with the class certification motion,  
 10 plus portions of the other filings made in connection with their motion for class certification;

11          WHEREAS, the administrative motion to seal filed by the indirect purchaser plaintiffs in  
 12 connection with their motion for class certification (Docket No. 881) covers 87 exhibits, some of  
 13 which include multiple documents produced by the defendants, plus portions of the other filings  
 14 made in connection with their motion for class certification;

15          WHEREAS, plaintiffs filed under seal the expert report and expert declaration in support  
 16 of their respective class certification motions, with accompanying exhibits;

17          WHEREAS, defendants' counsel require additional time to fully evaluate and respond to  
 18 plaintiffs' administrative motions to seal, and to coordinate among defendants with respect to  
 19 materials compiling or containing information produced by different defendants; and

20          WHEREAS, plaintiffs' counsel have no objection to providing additional time to respond  
 21 to those administrative motions;

22          IT IS HEREBY STIPULATED:

23          The deadline for filing declarations and any other materials in response to the  
 24 administrative motions to seal filed as Docket Nos. 877, 880, 881 and 895 shall be extended to  
 25 June 19, 2013.

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1 IT IS SO STIPULATED.

2 DATED: June 5, 2013

LATHAM & WATKINS LLP

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4 By /s / Belinda S Lee  
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8 *Acting as Liaison Counsel for Defendants*

9  
10 DATED: June 5, 2013

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15 *Interim Lead Counsel for Indirect Purchaser*  
16 Plaintiffs

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18 DATED: June 5, 2013

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27 *Interim Lead Counsel for Direct Purchaser Class*

## ATTESTATION OF FILING

I hereby attest that concurrence has been obtained from each of the above signatories to file this document with the Court.

By: \_\_\_\_\_ /s/ Belinda S Lee

\* \* \*

## **IT IS SO ORDERED.\***

DATED: 6/5/13

  
HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT COURT JUDGE

NY\5819762.1

\* The parties are reminded that sealing orders are to be narrowly tailored and that the only minimum redactions necessary to protect sealable information are permissible. See Civil Local Rule 79-5 and Commentary. The parties should strive towards providing a single, stipulated, proposed order that disposes of all sealing requests that have been or will be filed in connection with the class certification motion. If additional time will be necessary in light of the fact that further sealing requests may be filed, the parties may stipulate to additional extensions without seeking court approval, provided a global proposed sealing order is submitted at least one week prior to the hearing on the certification motion.